

EXHIBIT 10
FILED UNDER SEAL

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
)
)
Plaintiff,)
)
)
vs.) Case No.
) 3:17-cv-00939-WHA
UBER TECHNOLOGIES, INC.,)
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
)
)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF LIOR RON
San Francisco, California
Monday, April 19, 2017
Volume I

Reported by:
SUZANNE F. GUDELJ
CSR No. 5111
Job No. 2641996

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1 of a Google memorabilia or something that was handed
2 to Google employees.

3 And from my understanding, it had nothing
4 to do with self-driving cars or any sort of the
5 thing that Otto was doing. Looking at generally 02:34:53
6 stuff, it definitely doesn't strike like something
7 that could be used in anything that Otto was doing.

8 BY MR. PERLSON:

9 Q And when did you --

10 A But I did see that piece. 02:35:02

11 Q Thank you.

12 When did you -- when was that?

13 A I don't recall when exactly. After we left
14 Google. I don't know if before the February 9th
15 or -- the February time frame or after. 02:35:13

16 Q It would have been before the April 2016
17 agreement?

18 A I think so. I'm not a hundred percent
19 sure.

20 Q Did you tell any -- 02:35:22

21 A Because it was -- sorry.

22 Q I didn't mean to cut you off.

23 A It was while the company was at Anthony's
24 house, so it -- I did -- it definitely happened at
25 that time frame. I don't remember when we moved to 02:35:34

1 San Francisco.

2 Q And what do you mean "while the company was
3 at Anthony's house"?

4 A The initial operation of the company
5 started at Anthony's rented house. 02:35:44

6 Q Okay. And how long did that occur?

7 A From the time Anthony left Google to the
8 time we moved to San Francisco, to Harrison Street.
9 I don't recall when was that move, but few months
10 into doing Otto. 02:36:08

11 Q And so there were -- were there several
12 employees working at Mr. Levandowski's house when
13 Otto started?

14 A Yes.

15 Q And -- 02:36:21

16 A Sorry. Later on as Otto grew. When Otto
17 started, it was me, and it wasn't at Anthony's
18 house.

19 Q Okay. But there was an extended period of
20 time where Otto was operating out of Mr. 02:36:34
21 Levandowski's home?

22 MR. PATCHEN: Object to the form.

23 THE WITNESS: I don't know how -- I don't
24 remember how long, but it was roughly from the time
25 that Anthony left Google up until the time we moved 02:36:43

1 to San Francisco.

2 BY MR. PERLSON:

3 Q Okay. Did you tell anybody at Uber that
4 you saw the -- this StreetView camera thing at Mr.
5 Levandowski's home? 02:37:03

6 A I don't recall being asked specifically on
7 that, so I don't recall if I've actually mentioned
8 that at that time frame.

9 Q Well, whether or not anybody asked you
10 about it is not my question. I'm asking whether you 02:37:16
11 told anyone at Uber that.

12 A I don't recall specific conversations on
13 that.

14 Q Did you -- while you were -- let me start
15 over again. 02:37:28

16 Do you recall seeing any other Google
17 materials at Mr. Levandowski's home at any point in
18 time?

19 MR. PATCHEN: Object to the form.

20 THE WITNESS: No, I do not recall -- to the 02:37:46
21 best of my recollection, I don't recall anything
22 specifically. I do recall that thing because it's
23 hard to forget. It's pretty big.

24 BY MR. PERLSON:

25 Q Do you know whether Mr. Levandowski had 02:37:59

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1 taken any paper documents with him from Google or
2 seeing any at his house?

3 A No. I'm not aware of any paper documents
4 that I saw at his house. Or after.

5 Q Okay. Were -- when Otto was being operated 02:38:19
6 out of Mr. Levandowski's home, at any point in time,
7 did any Uber employees come to Otto?

8 A I don't believe so, but I wouldn't say for
9 sure in case I'm forgetting something. But to the
10 best of my recollection, I do not remember any Uber 02:39:02
11 employees at Anthony's house.

12 Q You don't ever remember seeing Mr. Kalanick
13 there?

14 A I'm trying to recall, because Travis did
15 come and visit us at some point. And he was 02:39:35
16 actually on the truck at some point taking actually
17 a ride with us on -- was it 101 or 280? I think
18 280.

19 But I don't remember if he visited the
20 house as part of that. He visited the truck for 02:40:14
21 sure. I remember 'cause I was there in a truck with
22 Travis and Anthony. I don't remember -- I don't
23 remember if he also came to the house or not.

24 Q Were there -- as part of just the
25 evaluation of the -- of Otto, did anyone at -- from 02:40:41

1 I, LIOR RON, do hereby declare under
2 penalty of perjury that I have read the foregoing
3 transcript of my deposition; that I have made such
4 corrections as noted herein, in ink, initialed by
5 me, or attached hereto; that my testimony as
6 contained herein, as corrected, is true and correct.

7 EXECUTED this _____ day of _____,
8 2017, at _____, _____.
9 (City) (State)

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14 _____
15 LIOR RON

16 Volume I
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